Comment on RM-10740, SSB Bandwidth Consideration

I've been an active Ham for 30 year or so and have found the so called "hifi ssb" movement a refreshing addition to the hobby. As a physicist/electronic engineer for a large aerospace company, I found it challenging and stimulating to 'enhance' an existing radio to produce ***50 – 3000 Hz*** audio with ***NO*** distortion and splatter. I have succeeded in doing this and this effort 'revived' my interest in the hobby. My results can be seen: http://pages.prodigy.net/jforgione/k6jrf.html Please note that my page has received almost ***41,000*** hits (readers) in three (3) years! That alone shows the interest in this aspect of the hobby.

W2ONV has been active in this effort for 20 years or so: it really has been his life. He alone as promoted this aspect of the hobby and made many technical advances to this effort.

To impose a 'bandwidth' restriction is not reasonable. Why? A key question needs to be answered: ***How do you retrofit all of the existing radios such as Kenwood's TS-850 w/ DSP100 module, TS-950, TS-870S, TS-2000; Icom's IC-756PRO, IC-756PROII, Yaesu's FT-1000MP, FT-1000D and finally, Tentec's Orion.*** All of these radios would become **illegal** since they all can **transmit beyond 2.8Khz!**

The original "hifi" ssb group are serious amateurs have contributed to the hobby in positive ways and advanced Ham radio. It would be a shame that two dissenting Hams impose their way to all Hams.

This petition is the direct result of disgruntled amateurs unconcerned about any other aspect of the Ham Radio other than their own narrowly defined operation, attempting to control the operating practices of Ham radio, based on personal objectives and intentional inflexibility in personal choice of bandwidth and/or frequency. From a practical standpoint, ***how would one differentiate a 2.8Khz from a 3.0Khz transmission?*** Practically, it's not possible!

Enforcement of the proposed regulations would require that the Commission become "Spectrum" police. For SSB signals, how could one decide just how much carrier and unwanted sideband suppression was enough, and then to measure that suppression and the total bandwidth for each signal on the band. For DSB signals you would likewise be required to decide how much suppression of the sidebands above 2.8 kHz was enough and to measure the total bandwidth of the signals. An impossible task!

Any consideration of this petition will open the door for additional petitions from amateur operators who find other modes, methods, or practices of operation unsuitable to their personal operating habits. For example, ***contests held on the amateur bands typically completely disrupt the ability of non-participants to use the amateur frequencies for other purposes for the length of the contest, typically 2 days!***. Most contest operators use excessive power above the limits defined in the Rules and transmit distorted signals from over-driven amplifiers that far exceed the bandwidth recommendations set forth by the petitioners and clearly violate FCC Rules, Part 97.307(a). This high-level contest operation essentially closes most amateur bands to non-contest operations because of the wide and distorted signals, failure of operators to listen before transmitting on top of other communications in progress, failure to operate within the definition of considerate Ham radio practice.

It is unfortunate that the FCC has elected to consider the petition submitted on behalf of a two amateur operators, who find fault with what has been characterized as 'hifi SSB' from ***FCC approved*** transceivers. As a engineer, I find that the people involved in this 'better' sounding radio brings up the level of good engineering practices, improves their expertise and promotes higher experimentation that has been the hallmark of Ham radio. This has not been seen in many years.

I request that this petition be denied in its entirety. I believe the Rules do not need to and should not be amended to specify strict bandwidth limits. If such a motion were adopted, the enforcement would be impossible! Also who would pay for the 'fixing' of existing FCC approved transceivers?

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